

**Glass, Molders, Pottery, Plastics & Allied Workers**  
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**(AFL-CIO, CLC)**

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June 6, 2002

Mr. Bill Pennington, Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Mr. Pennington:

Re: CEC Docket Number 01-BSTC-1 Construction Quality – Walls

The Glass, Molders, Pottery, Plastics & Allied Workers (GMP), have learned that the California Energy Commission (CEC) is considering improving the energy standard, Title 24. Improving the energy efficiency of buildings will benefit all citizens of California as well as our workers that enjoy good pay and benefits producing fiberglass insulation.

It is our understanding that the CEC is considering discounting the R-value of fiberglass insulation due to poor construction practices and effects of wall framing. This is apparently based on an inspection of 10 home, which is not a valid statistical sample. The most curious aspect of this issue is the singling out of fiberglass insulation which is a union made product and the preferential treatment given to a competitive product, cellulose insulation. This gives the appearance that the CEC is endorsing a particular type of insulation.

If the CEC pursues the current discounting method, it will result in working families paying for needless energy inspections because the CEC did not focus on the real problem, training and education of contractors, homebuilders and code officials. Your website already has an excellent training video which demonstrates the proper installation of fiberglass insulation.

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We urge the CEC to abandon the misguided and subjective discounting method in favor of education, training and better enforcement.

We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse J. Garcia". The signature is fluid and cursive, with the first name "Jesse" being more prominent.

Jesse J. Garcia  
International Vice President

/ak

cc: Lt. Governor Cruz Bustamante  
California State Capitol

Mr. William Keese  
California Energy Commission

Mr. Bryan Alcorn  
California Energy Commission